

**ND ASSOCIATION OF COUNTIES FUND  
INVESTMENT PERFORMANCE REPORT AS OF OCTOBER 31, 2006**

	October-06				September-06				Current	Prior Year	3 Years	5 Years
	Market Value	Allocation	Actual	Month Policy Net ROR	Market Value	Allocation	Actual	Quarter Net ROR	FYTD	FY06	Ended 6/30/2006	Ended 6/30/2006
									Net	Net	Net	Net
<b>LARGE CAP DOMESTIC EQUITY</b>												
<i>Structured Growth</i>												
Los Angeles Capital	35,979	4.3%	4.4%	4.34%	35,353	4.3%	4.4%	1.60%	6.01%	11.12%	N/A	N/A
<b>Total Structured Growth</b>	<b>35,979</b>	<b>4.3%</b>	<b>4.4%</b>	<b>4.34%</b>	<b>35,353</b>	<b>4.3%</b>	<b>4.4%</b>	<b>1.60%</b>	<b>6.01%</b>	<b>11.12%</b>	<b>12.01%</b>	<b>-0.32%</b>
<i>Russell 1000 Growth</i>				3.52%				3.94%	7.59%	6.12%	8.35%	-0.76%
<i>Structured Value</i>												
LSV	39,317	4.7%	4.4%	3.46%	38,954	4.7%	4.4%	4.90%	8.53%	15.05%	21.14%	12.22%
Russell 1000 Value				3.27%				6.22%	9.70%	12.10%	15.70%	6.89%
<i>Russell 1000 Enhanced Index</i>												
LA Capital	75,227	8.9%	8.9%	4.00%	70,517	8.6%	8.9%	3.71%	7.86%	11.58%	N/A	N/A
Russell 1000				3.40%				5.06%	8.62%	9.08%	N/A	N/A
<i>S&amp;P 500 Enhanced Index</i>												
Westridge	75,864	9.0%	8.9%	3.29%	75,299	9.2%	8.9%	5.75%	9.22%	8.77%	N/A	N/A
S&P 500				3.26%				5.67%	9.11%	8.63%	N/A	N/A
<i>Index</i>												
State Street	26,476			3.77%	26,158			5.78%	9.77%	9.51%	11.47%	2.62%
<b>Total 130/30</b>	<b>26,476</b>	<b>3.1%</b>	<b>3.0%</b>	<b>3.77%</b>	<b>26,158</b>	<b>3.2%</b>	<b>3.0%</b>	<b>5.78%</b>	<b>9.77%</b>	<b>9.51%</b>	<b>11.47%</b>	<b>2.62%</b>
S&P 500				3.26%				5.67%	9.11%	8.63%	11.22%	2.49%
<b>TOTAL LARGE CAP DOMESTIC EQUITY</b>	<b>252,864</b>	<b>30.0%</b>	<b>29.7%</b>	<b>3.72%</b>	<b>246,280</b>	<b>30.0%</b>	<b>29.7%</b>	<b>4.49%</b>	<b>8.38%</b>	<b>10.95%</b>	<b>13.63%</b>	<b>3.95%</b>
S&P 500				3.26%				5.67%	9.11%	8.63%	11.22%	2.49%
<b>SMALL CAP DOMESTIC EQUITY</b>												
<i>Manager-of-Managers</i>												
SEI	104,335	12.4%	12.1%	5.47%	98,913	12.0%	12.1%	-0.01%	5.46%	13.58%	18.20%	7.84%
Russell 2000 + 200bp				5.92%				0.94%	6.92%	16.86%	21.06%	10.38%
<b>TOTAL SMALL CAP DOMESTIC EQUITY</b>	<b>104,335</b>	<b>12.4%</b>	<b>12.1%</b>	<b>5.47%</b>	<b>98,913</b>	<b>12.0%</b>	<b>12.1%</b>	<b>-0.01%</b>	<b>5.46%</b>	<b>13.58%</b>	<b>18.20%</b>	<b>7.86%</b>
Russell 2000				5.76%				0.44%	6.22%	14.58%	18.70%	8.50%
<b>INTERNATIONAL EQUITY</b>												
<i>Large Cap - Active</i>												
Capital Guardian	46,222	5.5%	5.3%	3.73%	44,523	5.4%	5.3%	5.02%	8.94%	28.07%	20.99%	6.90%
LSV	45,111	5.3%	5.3%	3.74%	43,450	5.3%	5.3%	6.24%	10.21%	27.09%	N/A	N/A
<b>Total Large Cap - Active</b>	<b>91,333</b>	<b>10.8%</b>	<b>10.6%</b>	<b>3.73%</b>	<b>87,973</b>	<b>10.7%</b>	<b>10.6%</b>	<b>5.62%</b>	<b>9.57%</b>	<b>27.66%</b>	<b>21.92%</b>	<b>12.63%</b>
MSCI EAFE - 50% Hedged				3.38%				4.87%	8.42%	26.72%	22.56%	6.89%
<i>Small Cap - Value</i>												
Lazard	10,840	1.3%	1.3%	4.90%	10,336	1.3%	1.3%	0.72%	5.66%	23.65%	28.06%	N/A
Citigroup Broad Market Index < \$2BN				3.40%				1.53%	4.98%	29.28%	32.40%	N/A
<i>Small Cap - Growth</i>												
Vanguard	11,062	1.3%	1.3%	3.66%	10,671	1.3%	1.3%	3.73%	7.52%	29.24%	32.39%	N/A
Citigroup Broad Market Index < \$2BN				3.40%				1.53%	4.98%	29.28%	32.40%	N/A
<b>TOTAL INTERNATIONAL EQUITY</b>	<b>113,235</b>	<b>13.4%</b>	<b>13.3%</b>	<b>3.83%</b>	<b>108,979</b>	<b>13.3%</b>	<b>13.3%</b>	<b>4.93%</b>	<b>8.95%</b>	<b>27.35%</b>	<b>23.83%</b>	<b>8.67%</b>
MSCI EAFE - 50% Hedged				3.38%				4.87%	8.42%	26.72%	22.56%	6.89%
<b>DOMESTIC FIXED INCOME</b>												
<i>Core Bond</i>												
Western Asset	114,081	13.5%	13.8%	0.90%	112,772	13.7%	13.8%	4.45%	5.39%	-0.90%	7.36%	8.59%
Lehman Aggregate				0.66%				3.81%	4.49%	-0.81%	2.05%	4.97%
<i>Core Plus/Enhanced</i>												
Clifton Group	26,174	3.1%	3.2%	0.52%	26,012	3.2%	3.2%	N/A	N/A	N/A	N/A	N/A
Prudential	26,053	3.1%	3.2%	1.03%	25,722	3.1%	3.2%	N/A	N/A	N/A	N/A	N/A
<b>Total Core Plus/Enhanced</b>	<b>52,227</b>	<b>6.2%</b>	<b>6.4%</b>	<b>0.77%</b>	<b>51,734</b>	<b>6.3%</b>	<b>6.4%</b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>
Lehman Aggregate				0.66%				3.81%				
<i>Index</i>												
Bank of ND	50,017	5.9%	6.0%	0.61%	49,600	6.0%	6.0%	3.10%	3.73%	-1.14%	1.14%	4.90%
Lehman Gov/Credit (1)				0.63%				3.91%	4.57%	-1.52%	1.04%	4.78%
<i>BBB Average Quality</i>												
Wells Capital (formerly Strong)	114,093	13.5%	13.8%	0.96%	112,741	13.7%	13.8%	4.60%	5.60%	-2.11%	2.63%	N/A
Lehman US Credit BAA				0.89%				4.80%	5.73%	-2.37%	2.63%	N/A
<b>TOTAL DOMESTIC FIXED INCOME</b>	<b>330,419</b>	<b>39.2%</b>	<b>40.0%</b>	<b>0.86%</b>	<b>326,847</b>	<b>39.8%</b>	<b>40.0%</b>	<b>4.28%</b>	<b>5.18%</b>	<b>-1.39%</b>	<b>6.59%</b>	<b>7.79%</b>
Lehman Aggregate (2)				0.66%				3.81%	4.49%	-0.81%	1.84%	5.28%
<b>CASH EQUIVALENTS</b>												
Bank of ND	42,662	5.1%	5.0%	0.44%	40,527	4.9%	5.0%	1.35%	1.79%	4.50%	2.71%	2.42%
90 Day T-Bill				0.38%				1.33%	1.71%	4.00%	2.37%	2.25%
<b>TOTAL NDACo FUND</b>	<b>843,515</b>	<b>100.0%</b>	<b>100.0%</b>	<b>2.65%</b>	<b>821,546</b>	<b>100.0%</b>	<b>100.0%</b>	<b>3.76%</b>	<b>6.51%</b>	<b>6.38%</b>	<b>8.63%</b>	<b>5.44%</b>
POLICY TARGET BENCHMARK				2.39%				3.97%	6.46%	6.01%	7.83%	5.26%

NOTE: Monthly returns and market values are preliminary and subject to change.

(1) From April 1, 2004, through June 30, 2005, the benchmark was the LB Intermediate Govt/Credit index.

(2) Prior to July 1, 2005, the benchmark was LB Govt/Credit Index.